

EPA-PNL-11

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To Phil North

cc

bcc

Subject Assessment Lacks Objectivity

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Pebble Update

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AMA: Grave Concerns For Pre-Permit Assessment

The Alaska Miners Association (AMA) has formally expressed grave concerns to the Environmental Protection Agency (EPA), related to its draft Bristol Bay watershed assessment.

Categorizing the literature review's multiple flaws into five major categories, each of which document a wide list of technical, engineering and scientific issues, the AMA has stated that a preemptive decision on any project is unacceptable prior to an initiated permitting process.

Citing concerns related to credibility, validity of the document, unrealistic modeling and inflammatory and misleading statements, the AMA has called on the EPA to disregard the draft assessment altogether and allow the existing state and federal permitting processes to proceed.

Pre-Design Risk Assessment Is Failed Methodology

The Institute of Social and Economic Research (ISER), a department of the University of Alaska, has drafted a report titled: "Assessing Ecological Risk of Proposed Mines: Can Valid Assessments Be Done Pre-Design." This report was submitted to the Environmental Protection Agency (EPA) by the Alaska Miners Association (AMA) as part of its review of the EPA draft Bristol Bay watershed assessment.

Addressing the many deficiencies of a report by The Nature Conservancy (TNC) and similar to deficiencies identified in the EPA's draft Bristol Bay watershed assessment, the ISER report details how premature actions such as pre-design risk assessments can potentially circumvent established processes based on assumptions rather than factual data.

The report concludes that the pre-design ecological risk assessment prepared by TNC lacked project-specific design details and used limited information to project what could happen if the Pebble Mine were developed. The ISER report further states TNC's document "Introduced bias, made unrealistic assumptions and omitted preventative mitigation strategies. As a result conclusions are not reliable."

[Read the full report...](#)

AMA submitted both a detailed technical review of the draft Bristol Bay watershed assessment, as well as an appendix report from the Institute of Social and Economic Research (ISER). [Read the AMA's evaluation](#) and [AMA technical report...](#)

National Mining Association Calls Initiative Disingenuous, Sensational "Straw Man"

Noting that the Environmental Protection Agency's (EPA) draft Bristol Bay watershed assessment involves complex questions and issues of state and federal law, as well as multiple scientific flaws, the National Mining Association (NMA) has voiced its strong objection to the EPA's current actions.

Calling into question the EPA's methods and its failure to state why the agency has chosen to move forward in this manner, the NMA states that the draft assessment is woefully inadequate and represents bad public policy. [Read the NMA's evaluation...](#)

Alaska Speaks

To review additional documents submitted to the Environmental Protection Agency (EPA) from Alaska Native Regional Corporations, industry, Alaska organizations and businesses, as well as Alaska residents, [link here.](#)

Handy links:

[Alaska Resource Development Council](#)
[Alaska Miners Association](#)
[United States Geological Survey](#)
[Alaska Department of Natural Resources](#)
[Alaska Division of Mining, Land and Water](#)
[Alaska Department of Fish & Game](#)
[Truth About Pebble](#)
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